

REMARKS(A) Introductory Comments

This is in response to the office action mailed February 18, 2003. The Examiner is advised that a Petition for a one month extension of time, with fee based on small entity, accompanies this Response.

Claims 1 to 34 are pending in this application. In this Response, amendments have been made with respect to claims 1, 10, 11, 12, 13, 25, 33 and 34. Based on the claim amendments, as well as the detailed discussion below, favorable reconsideration of the all of the claims in this application is requested.

In the office action, the Examiner has set forth a complex combination of rejections and reference cited. It is not practical to address each rejection as a separate matter, since it would render the Response unwieldy. However, Applicant will discuss in some detail each of the references applied in the rejections, and highlight the differences of the presently claimed invention and the distinctive features thereof.

Many of the independent claims have been amended to highlight an important characteristic of the invention. This is the flexibility and wide applicability of the device of the

invention. The invention is for an interface device which connects, on the one hand, to large numbers and types of computers, and, on the other hand, to large numbers and types of telephones. It then facilitates communication between the particular computer and the particular telephone to which it happens to be connected. This is clearly recited in the claims. No reference cited and/or applied by the Examiner comes anywhere near describing a device of this type.

In reviewing Applicants arguments and position set out below, and assessing the patentability of the claimed subject matter, the Examiner is requested to bear this underlying feature of the invention in mind.

(B) DISCUSSION OF REFERENCES AND CLAIMED INVENTION

(1) Morris (US 4,991,197)

As regards claim 1, Morris discloses an apparatus for controlling the path of voice and data signals in a communications system which comprises at least a speaker phone, a cellular transmit/receive unit, a cellular handset and a computer having at least a communications software program, a keyboard and an I/O port for communications" (see Col. 9 lines 49-54). Morris discloses that "The present invention provides a control circuit

for controlling the path of voice and data signals in a communication system which comprises at least a speaker phone, a telephone-type headset, a cellular transmit/receive unit, a cellular handset and a computer having at least a communications software program, a keyboard and an I/O port for communications. The control circuit receives voice and data signals from a plurality of different input sources and routes or switches the received voice and data signals to different selectable destinations." (Col 1. lines 50-60).

The claimed invention has no voice communication at all and, hence, has no control circuits or methods of switching between voice and data. The claimed invention is not a communication system and does not have: a speaker phone, a cellular unit, a cellular handset, a telephone-type headset, a computer, any communications software or a keyboard.

Morris discloses integrating a computer and a cellular telephone in a complete communications package. In contrast, the claimed invention does not have a computer or a telephone. Rather, it is an interface between many forms of computers and many forms of land and cellular telephones. The invention has and integrates: USB, serial and infrared transceiver communications to computers; and, acoustic coupler, RJ-11 and all forms of

cellular telephone connections (AMPS, TDMA, CDMA, GSM) to telephone systems in the same device. Morris discloses none of these features or interfaces.

Very importantly, Morris' device further forces the user to only use Morris' choice of computer and Morris' choice of cellular phone (AMPS, TDMA, CDMA, GSM). *This defeats a critical characteristic feature of the invention, namely, to serve as an interface between many forms of computers and many forms of land and cellular telephones.*

As such, Morris does not disclose a Communications interface device at all. In fact, Morris' only use of the word "interface" relates to internal interfaces between different components inside of Morris' device.

In conclusion, the claimed invention is an interface between many forms of computers and many forms of land and cellular telephones. Morris and the present invention are different from each other and perform different tasks.

As regards Claim 5, Morris does not disclose and does not have a connecting means of a serial port. Morris never once even

uses the word "serial". Morris discloses an RS-232 port buried inside his device (Col. 3 line 24). The port is not available to or accessible by the user to connect anything to, because it is buried inside the device and is permanently (and solely) used to connect Morris' own internal control circuit to Morris' own internal computer. Morris' device is *already* a computer and as such does not need any serial port to connect to any external computer.

In contrast, the claimed invention has an external serial port for the user to connect to the user's own computer.

As regards Claim 9, Morris' device includes a wireless telephone. The present invention does not include a wireless telephone; rather, it is an *interface* to allow connection to the user's existing wireless telephone.

It should also be noted that Morris' device would require a new different wireless phone contract to use Morris' device's internal telephone, but the present invention uses the user's existing wireless phone contract and existing wireless phone. This will help to highlight the difference between Morris and the present invention.

As regards Claim 10, Morris' device cannot "select from the group consisting of a cellular and PCS telephone". Morris' device is completely limited to the type of wireless telephone built into Morris' device. The present invention, in contrast, connects to AMPS, CDMA, TDMA and GSM wireless telephones worldwide.

As regards amended claim 33, Morris' device can only connect the computer that happens to be already built into Morris' device to the wireless telephone that happens to be built into Morris' device. The invention, in complete contrast, interfaces many types of computers to many types of wireless telephone (AMPS, CDMA, TDMA, GSM). It is an interface between them.

Morris' device is a computer and is a wireless telephone. The present invention is not a computer and is not a wireless telephone. It is a means for processing signals between a variable and selected Computer and all telephones (wireless or landline).

As regards claim 34, Morris does not disclose methods for transferring signals between a computer and telephone. Morris' device is a computer and is a telephone. Morris discloses methods for the detection and redirection of voice and data signals. In contrast, the present invention is not a computer and is not a

telephone. It is an interface between many forms of computers and many forms of land and cellular telephones. It does not have any voice at all, or any voice detection or redirection.

In summary, Morris does not disclose a communications interface device at all, but a computer, a cellular phone, a cellular handset, a speaker phone, communications software, a display and a keyboard. The present invention does not have any of the above components, but is an interface between the user's existing separate computer and the user's existing separate telephone. The invention has a means to connect user's computers to user's cellular telephones. Morris' device has no means to connect user's computers to user's cellular telephones.

Our device further has an acoustic coupler and has infrared communications as a main interface. Morris' device has no acoustic coupler and no infrared Communications.

(2) Fukawa (US 5,890,073)

As regards Claim 1, Fukawa discloses a complete mobile terminal with a two way radio (not a cellular phone) and with methods of switching between voice and data messaging (Col. 2 lines 6-21, Col. 11 lines 7-14). The present invention is not a terminal, has no two way radio and has no voice communication at

all or any methods of switching between voice and data.

Fukawa discloses a device communicable with a "central office" stationary radio station (Col. 1 lines 45-51, Col. 3 lines 60-63, Col. 5 lines 48-60, Col. 6 lines 8-12, Col. 6 lines 44-45, Col. 10 lines 64-65, Col. 11 lines 2-5). The invention interfaces computers to telephones allowing Internet, data and fax communication to anyone.

Fukawa discloses no Internet connection and no ability to send and receive fax and other data. The invention can connect to the Internet and can send and receive fax and other data. The acoustic coupler, RJ-11 or direct cellular connection can be used for these connections.

Fukawa discloses an acoustic coupler whose only possible use is to connect with a "central office" (Col. 3 lines 59&65, Col. 5 lines 47-50, Col. 6 lines 9-12, Col. 10 lines 61-65. The invention has an acoustic coupler, which can connect to the Internet and to any telephone in the world to send and receive fax and other data.

Fukawa discloses voice communication as a main feature. Our device has no voice communication.

Fukawa does not disclose a Communications interface device at all. Fukawa never once even uses the word "interface".

Fukawa's device is a complete mobile terminal, whereas as the invention is an interface between many forms of computers and many forms of land and cellular telephones.

As regards claim 18, Fukawa does not disclose a 2.5mm cable connection.

In summary, Fukawa's device is a complete mobile terminal with a two way radio and a display. The invention is not a terminal, does not have a two way radio and does not have a display. It interfaces the user's existing separate computers and telephones. Fukawa's device is specifically to be able to pass both voice and data and to automatically select and change between voice and data. The invention is for data only and can not pass voice at all or do any switching.

(3) Dunn (US 5,995,599)

As regards claim 25, Dunn discloses a complete "handheld communications device" (Col. 1 line 67 - Col. 2 lines 9, 23, 42, 56, 60&61, Col. 3 lines 27, 29, 30, 34 & 35, Col. 4 lines 21, 22, 28, 30, 31, 37, 40, 62 & 67, Col. 5 lines 5, 6, 29, 30, 49, 50, 52, 61 & 62, Col. 6 lines 14, 15 & 64, Col. 7 lines 43-45).

The invention is not a handheld communications device.

Dunn discloses a handheld communication device with a display (Col. 4 lines 36, 37, 41 & 64), a keyboard (Col. 4 lines 35, 39 & 54) and a means to generate, send, receive and store information (Col. 4 lines 51-67). The invention has no display, no keyboard and has no means to generate, send, receive or store information; the interface device interfaces user's existing computers to user's existing telephones to allow the existing computer to generate, send, receive and store information.

While Dunn discloses an acoustic coupler integrated into a complete Communications device, the invention has an acoustic coupler to interface users existing Communications device (computer) to users existing telephones.

As regards claim 32, Dunn does not disclose anything to facilitate attachment of the interface device. Dunn's device is not an interface device.

(4) Coulter (US 6,304,638 B1)

Regarding Claim 1, Coulter discloses that "The present invention relates generally to acoustically coupled information devices, and in particular, to a coupler enabling communication of information between a communication device and an acoustic device, such as a telephone, using acoustic tones." (Col. 1 lines 16-20). Coulter discloses "a coupler detachably attachable to the first device, the coupler configured to receive information from the second device in the form of acoustic tones and to communicate the information received from the second device to the first device in a form useable by the first device, and to receive information from the first device and communicate the information to the second device in the form of acoustic tones; wherein the coupler comprises a speaker for transmitting the information in the form of acoustical tones to the second device, a microphone for receiving information from the second device in the form of acoustical tones, and an adjustment mechanism for facilitating coupling between the speaker and the second device and between the microphone and the second device" (Col. 9 lines 24-38).

Coulter does not disclose a Communications interface device at all. Coulter never once even uses the word "interface". Coulter discloses an acoustic coupler to connect to specific PIMs and PDAs. The invention is an interface, which also includes an

acoustic coupler as on of many universal interfaces.

The invention has RJ-11 and cellular phone connections, in addition to an acoustic coupler. Coulter discloses no RJ-11 or cellular phone connectors at all. Coulter discloses no other telephone connection except an acoustic coupler.

The invention has serial, USB and infrared connections to computers. Coulter's device does not have serial, USB or infrared at all. Coulter does not disclose connection methods to computers at all. Coulter's drawings show only proprietary connectors to specific PIMs and PDAs.

Furthermore, Coulter's device is limited to use with one specific brand and model of PIM or PDA. In contrast, the invention is universal and connects to most PIMs, PDAs and notebooks using infrared USB and serial interfaces. Coulter discloses no infrared, USB or serial interfaces.

Coulter completely fails as a reference to support the rejections of claims 2 and 3.

Coulter discloses no connections to computers at all, whereas the invention connects to computers through infrared,

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serial and USB.

If the Examiner has any questions, he is invited to contact the undersigned at (818)710-2788.

Please acknowledge receipt hereof by stamping and returning the enclosed return postcard.

Respectfully submitted,



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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, P. O. Box 1450, Alexandria, VA 22313-1450, on June 18, 2003.



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